

REMARKS

Claims 11-25 are now in the case.

The present remarks are supplemental to the remarks and the three-page chart that accompanied the now-entered but previously unentered proposed Amendment filed September 5, 2007.

The Examiner is requested to consider the aforesaid Amendment, the remarks, and the three-page chart prior to consideration of the present Supplemental Amendment and these remarks.

Claims 11 and 14 have been edited to state that the direction of conveyance is from the boom to the feeder for the essentially rectangular piece of cloth. Claim 12 now recites that the second feed conveyor receives a straightened front edge of a second piece of cloth and transfers it to the boom conveyor. (The Examiner had pointed out that this recitation was missing.) Claim 13 has been edited to state that the second feed conveyor has a corresponding second feeding end. Claim 19 has been amended to eliminate the word "means" because of the Examiner's concern with this word.

In the method claims, claim 20 has been amended by stating that the steps occur prior to ironing of an essentially rectangular piece of cloth. This same amendment has been made to claim 11 and is present in new independent claim 22. The phrase "prior to ironing" is a further distinguishing feature over the U.S. patent to Branch, No. 5,419,439 which describes a multiple sortation system for garments after they have been laundered and placed on hangers.

Claims 23-25 are dependent directly or ultimately on claim 22. Claim 25 adds five additional mechanical steps that operate upon the straightened front edge of a second essentially rectangular piece of cloth, beginning with the conveying by a second

feed conveyor of this straightened front edge and concluding with the conveying of the second essentially rectangular piece of cloth across the boom.

The rejections under 35 U.S.C. §§ 102(b) and 112, second paragraph, in the final Office Action of June 6, 2007 were answered in the now-entered Amendment of September 5, 2007. Because of the entry of that Amendment, the Examiner is respectfully requested to consider that Amendment, its remarks, and the three-page chart that distinguishes the claims over Branch. Also, the Examiner is requested to consider the following additional remarks.

The Examiner has refused to consider or lend weight to functional language in the rejected apparatus claims in an attempt to read the non-analogous Branch patent on those claims. The claims including the functional language have been drafted so that both the preambles and the bodies define the claimed inventions. It is these claimed inventions and not some other that the issued patent will ultimately protect and to which the Examiner must direct his examination. By so doing, he will find that Branch does not disclose or show pursuant to Section 102 the feeding or introduction of an essentially rectangular piece of cloth to a feeder and certainly could not do this prior to ironing because Branch's shirts are already ironed. The preambles alone thus excuse Branch as a relevant and analogous reference.

Secondly, the presence of functional language cannot be ignored. The use of functional language is a practical necessity. For example, claim 11 recites:

“wherein the boom comprises a boom conveyor for conveying the piece of cloth across the boom in the longitudinal direction thereof, wherein the piece of cloth stretches across the boom,”

In Branch, numeral 88 is a slide, and 90 is a conveyor of hangers (with shirts draped thereon). The claim limitation recited above requires that the boom conveyor convey the (essentially rectangular) piece of cloth across the boom in the longitudinal direction thereof. Neither slide 88 nor hanger conveyor 90 in the movement of laundered shirts on hangers discloses or shows the conveyance of the aforesaid essentially rectangular piece of cloth across a boom in the longitudinal direction. Branch also does not disclose or show stretching a piece of cloth across a boom. In fact, Branch does not remotely contemplate this functional requirement because it would destroy the purpose of Branch to remove the laundered shirts from their hangers during the sorting procedure and stretch them over slide 88 or conveyor 90.

Dependent claim 12 and claims dependent thereon and method claim 25 introduce the second feed conveyor. The Examiner argues that rail 260 in Branch feeds pieces of cloth to sortation assembly 200. However, collecting rail 260 appears to be not for feeding but for the removal of hangered shirts at the end of the sortation process. See col. 12, lines 25-39, of Branch. The garments are said to be swept away toward the reverse curve portion 260A of collecting rail 260 which spirals downward and away from third sortation assembly 200. It is submitted that Branch does not teach or show the second feed conveyor apparatus or method as claimed.

The final rejection did not address method claim 20, presumably because of an inability to read Branch upon this claim. The Examiner in the Advisory Action of September 13, 2007 argues that Branch operates upon the straightened front edge of a piece of cloth in various steps. This is a totally new argument, completely lacking in finding any support in Branch. Not only can the Examiner not point to any disclosure or

showing in Branch of operating upon the straightened front edge of a piece of cloth, but also he avoids addressing the claim language that the straightened front edge is part of an essentially rectangular piece of cloth (nor a shirt on a hanger). It is thus submitted the Examiner's position is factually incorrect. Branch does not show the identical invention and in the complete detail contained in the process claims as required by Section 102.

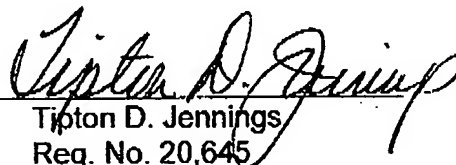
Early examination and allowance of all claims are earnestly solicited.

Please grant any additional extensions of time required to enter this response and charge any additional required fees to our Deposit Account 06-0916.

Respectfully submitted,

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Dated: October 9, 2007

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